

**UNITED STATES DISTRICT COURT  
WESTERN DIVISION OF WASHINGTON**

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CLINT DIDIER, LISA THOMAS, TIM  
EYMAN, LAWANDA JOY HATCH,  
DEAN WELLSFRY, PATTY DETRO,  
and JASON BERNICA, and OTHER  
NONESENTIAL WASHINGTONIANS  
SIMILARLY SITUATED,

Plaintiffs,

JAY INSLEE, in his capacity as Governor  
of the state of Washington,

Defendant,

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**NO. 3:20-cv-5408**

DECLARATION OF  
S. ROWAN WILSON

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I, S. Rowan Wilson, a plaintiff named in this case, on oath and subject to the laws of perjury in the state of Washington, being over 18 years of age and competent to testify to the matters set forth herein, now declare as follows:

1. My name is S. Rowan Wilson, and I am an Accountant for US Tech solutions with an MBA in Finance. At the time of the Inslee Proclamations, I was contracted onsite at Expedia Group at the rate of \$69 per hour or approximately \$143K per year not including benefits. Expedia Group is an American online travel shopping company for consumer and business travel. Its websites,

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which are primarily travel fare aggregators and travel metasearch engines, include CarRentals.com, Expedia.com, HomeAway, Hotels.com, Hotwire.com, Orbitz, Travelocity, trivago, Vrbo and various cruise companies.

2. My contract was projected to last through September of this year, 2020. Expedia is a wonderful company and an ideal career choice for me; I put myself through school including in other countries. Hard work has allowed the fortune to travel more than most Americans. Expedia's flagship headquarters had recently opened when I joined the organization. The campus was still expanding with daily construction on the green-certified waterfront buildings.

3. I have since been laid off from the company due to the actions of the state and in particular, due to the Proclamations of Jay Inslee, who has all but killed the entire travel industry.

4. I was awarded unemployment in April; however payments have been delayed into non-existent status due to cyber-security measures reportedly due to a “Nigerian hacking scheme.” Washington was named as the “primary state targeted” in a Secret Service memo warning of a “well-organized Nigerian fraud ring exploiting the Covid-19 crisis to commit large-scale fraud against state unemployment insurance programs,” and Employment Security Department (ESD) Commissioner Suzan LeVine reported that the crafty Nigerians had gotten away with “orders of magnitude above” the \$1.6 million her department lost to fraud.

5. I call for a full, truly external third-party audit of the WA ESD system in the state of Washington in place, well away from the current Washington State Office of Auditor, Pat McCarthy. There is usually an indication of problems before fraud, embezzlement and “hacking” are discovered. Smaller amounts are tried. All the cardinal signs of fraud, embezzlement and misappropriation of funds are present in the state of Washington ESD claims. Furthermore, \$44 million was spent on a new upgraded computer software system which was to prevent malfunction

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and streamline the processes, however the outcome has resulted in outright theft from we the people of Washington state, including me, who lost her position as a direct result of the Governor's Stay Home – Stay Safe order.

6. Due to lack of and incorrect unemployment payments, I'm currently working a temporary, early morning, lower-level healthcare related position at the rate of \$18 per hour, drawing upon a pre-med history and taking an income deficit of \$51 dollars an hour. Neither job security nor benefits are offered, and I am not working in my trained and preferred vocation of data finance.

7. The current COVID-19 unemployment scheme would be more lucrative if I sat home and took tacit online classes, applying for more data finance jobs rather than working. However, if I were to quit or leave the current temporary job, I would not be eligible for unemployment benefits at my previous level, even given non-payments. Payments further end on July 31, 2020.

8. Growing up in the Midwest, the value of work was bred into me. I like working and contributing to society. Making money helping others also feels good. My ability to do so in my chosen profession at a job I loved in travel and dealing with mass amounts of data has been ripped from me, almost entirely illegally by an unjust tyrant.

9. Outgoing Governor Jay Inslee further taxes citizens, sitting as arbiter and king over who may work, travel, have freedom of movement and to open business with patronage.

10. The financial impact map put out by Harvard Business School shows incredible growing business impact on the state of Washington with the Puget sound region area jobs alone down -10.24%.

11. I am not sick and actively strengthening my immune system having had a tonsillectomy as a child. This is done with vitamins, minerals, proper nutrition, exercise, sunshine and I am on no pharmaceutical prescriptions though have some medical concerns.

12. There is also a substantial impact on my re-employment opportunities, now with ongoing contact tracing and GPS tracking using Contract Tracing Apps (On Android devices, under Settings/Google, and on the I-Phone under Settings/Health), and Inslee's continual shutdowns.

13. As of this final writing today, the temporary job at which I have been working has been shutdown due to a likely false-positive or conflated antibody test of a worker. The entire facility ceased operations immediately, despite NO ONE's body temperature scanning above 98' fahrenheit for over one week. The company will lose millions of dollars with a continual shutdown and workers shall miss pay. We are further in danger of being illegally mandated to our homes with masks due to the Governor's unconstitutional order.

14. Government shutdown of "non-essential" business such as the travel industry is completely without empathy for the human condition, nor does it factor the human cost. The governor claims that stopping Covid-19 is a high priority, but he ignores domestic violence increases in our state, the overall death rate, and the effects on children.

Signed in Snoqualmie, Washington, this 9<sup>th</sup> day of July 2020.

// S. Rowan Wilson  
S. Rowan Wilson, Plaintiff